



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

Office of Title I Academic Support

June 23, 2008

Dr. Franzy Fleck, Superintendent
East Gibson School Corporation #2725
133 East Morton Street
Oakland City, IN 47660-1819

Dear Dr. Fleck:

On May 5, 2008, the Indiana Department of Education's monitoring team commenced an on-site monitoring review of the East Gibson School Corporation's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a revised report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, East Gibson School Corporation **is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, East Gibson School Corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance to East Gibson School Corporation where appropriate.

The IDOE team would like to thank you, Dave Chamness and your staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

Sincerely,

Lee Ann Kwiatkowski, Director
Office of Title I Academic Support

cc: Dave Chamness, Supervisor of Title I
East Gibson School Corporation #2725

Linda Miller, Assistant Superintendent
Center for School and Student Academic Support

**Indiana Department of Education
Title I, Part A Monitoring**

District: East Gibson School Corporation

Monitoring Date: May 5, 2008

Monitoring Team: Lee Ann Kwiatkowski, Linda Ricketts, Laura Cope, Teresa Neely, Sarah Pies

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of the East Gibson School Corporation on May 5, 2008. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
4) Compliance with district improvement requirements	NCLB §1116(c)
5) Compliance with schoolwide program requirements	NCLB §1114
6) Compliance with targeted assistance program requirements	NCLB §1115
7) Compliance with school ranking and serving requirements	NCLB §1113
8) Compliance with comparability requirement	NCLB §1120A
9) Compliance with maintenance of	NCLB §1120A

effort requirement	NCLB §9521
10) Compliance with equitable services to private school students requirements	NCLB §1120
11) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
12) Compliance with supplement, not supplant requirements	NCLB §1120A
13) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
14) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
15) Compliance with complaint procedures	Subpart F- Complaint Procedure (CFR, Title 34)
16) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
17) Compliance with Neglected Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from East Gibson School Corporation at their central office. In addition, IDOE visited Francisco Elementary and Oakland City Elementary, where interviews were conducted with the principals and the Title I staff.

IDOE reviewed documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB professional qualification requirements for teachers and paraprofessionals

Background

IDOE interviewed the Title I Program Supervisor. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, "highly qualified" is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Parents' Right to Know: Teacher Qualification: East Gibson School Corporation did ensure that all parents of students in Title I served schools received the Parents' Right to Know notification explaining that they could request information on the qualifications of their children's instructors. An appropriate letter and proof of mailing were provided. Letters were mailed directly from the central office.

Professional qualification requirements for paraprofessionals: East Gibson School Corporation produced evidence demonstrating that all paraprofessionals meet the highly qualified requirements.

5% set-aside: East Gibson School Corporation did not reserve 5% of its allocation to support assisting teachers in reaching the professional qualification requirements. Teachers in Title I schools are highly qualified.

Principal Attestation: East Gibson School Corporation ensures that the principal of every school receiving Title I funds has attested annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

Parents' Right to Know re: non-highly qualified teacher: East Gibson School Corporation did not have any students taught by a teacher for four or more consecutive weeks during the 2007-2008 school year that was not highly qualified.

Professional qualification requirements: East Gibson School Corporation produced evidence demonstrating that teachers of core academic subject areas meet the highly qualified status required for compliance with NCLB regulations. HOUSSE documentation, Praxis scores, and licensure were reviewed for compliance based on a random sampling of teachers at Francisco and Oakland City Elementary Schools. All documentation is kept at the school level.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

None.

Monitoring Topic 2: Compliance with parental involvement requirements

Background

IDOE interviewed the Title I Program Supervisor and the corporation treasurer as well as the principal of Francisco Elementary. In addition, IDOE reviewed policies and agendas provided at the on-site.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

LEA Parent Involvement Policy: East Gibson School Corporation was able to provide evidence that it had a district parental involvement policy; the policy contains all of the statutory components as specified in NCLB.

Distribution of Parental Involvement Policies: The LEA and school parental involvement policies were mailed to parents in November of 2007.

Annual meeting: Both Oakland City and Francisco Elementary Schools held an annual parent meeting. The meeting was announced by a flyer. The Annual Meeting was scheduled for November of 2007. IDOE saw evidence that parents have been made aware of this meeting.

Building schools' and parents' capacity for strong parental involvement: East Gibson School Corporation showed that both Francisco and Oakland City Elementary Schools were building parent's capacity in a variety of ways. The instructional assistants at both schools call parents of each Title I identified student on a weekly basis. Parents are invited to Make It Take It nights where Title I staff work with parents to develop learning games that can be played with their child at home.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

Reviews Effectiveness of Parental Involvement Activities: East Gibson School Corporation provided evidence that the Title I program is evaluated by parents.

Recommendation: In addition to evaluating the program parents also need to be given an opportunity to evaluate the effectiveness of the parent involvement activities. This can be done by a simple survey at the end of a parent involvement activity.

LEA Parent Involvement Policy: regarding joint development: East Gibson School Corporation was unable to demonstrate that parents were involved in the joint development of the parent involvement policy.

Required Action: East Gibson School Corporation must submit sign-in sheets from staff and parents that developed this plan and ensure that parents are involved in the creation of parent policies 30 days after the start of the school year.

School Written Parental Involvement Policy and Compact: East Gibson School Corporation does not have School Parental Involvement Policies that contain all required components. Although schools have parental involvement policies, a thorough review of Oakland City and Francisco Elementary Schools revealed that essential components are missing from both the policies and the compacts. (See Attachment A)

Required Action: East Gibson School Corporation must submit School Parental Involvement Policies including compacts for Oakland City and Francisco Elementary Schools to the IDOE. Evidence must be submitted to the IDOE showing the policies were developed with meaningful consultation with parents. Evidence must also be submitted to the IDOE that shows the policies were distributed to all parents. East Gibson School Corporation must ensure that the Parental Involvement Policies contain the necessary components as stated in Sec. 1118 in order to be in compliance with NCLB requirements. Parental Involvement Policies must be updated with parents annually. All evidence must be submitted to the IDOE 30 days after the start of the 2008-2009 school year.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and Supplemental Educational Services (SES).

Background

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

East Gibson School Corporation does not have any schools in school improvement.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

East Gibson School Corporation is not in district improvement.

Monitoring Topic 5: Compliance with schoolwide program requirements

Background

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

East Gibson School Corporation does not have any schools with Schoolwide programs.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

Methods and Instructional Strategies: East Gibson School Corporation use methods and instructional strategies that are based on scientifically-based research. Early Success is implemented at the primary level. Soar to Success and after school tutoring are used in other grades to support students.

Coordination and Integration of Staff: East Gibson School Corporation was able to demonstrate that Title I paraprofessionals coordinate with classroom teachers and are involved in the same professional development opportunities.

Refusal of Service: A letter was on file for students that refused services.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6

Student Selection: Oakland City Elementary was able to provide a rank-order list for Kindergarten. However, Oakland City Elementary was unable to provide a ranking list for grades 1-5 that listed all students, the list only contained names of students being served in Title I. Francisco Elementary did not have a copy of the student selection list for the Title I students being served.

Required Action: Oakland City and Francisco Elementary Schools need to list all students in the grades being served with Title I on the ranking and serving list. Selection of students must be based on multiple educationally related, objective, uniformly applied criteria given to all students at each grade level targeted. Francisco Elementary must be provided with professional development on how to do student selection and must be provided with the student selection list. The ranking lists for both schools must be submitted to the IDOE 30 days after the start of the 2008-2009 school year.

Monitoring Topic 7: Compliance with School Ranking and Serving Requirements

Background

IDOE interviewed the Title I Program Supervisor and the corporation treasurer regarding the Title I ranking and serving requirements.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Areas of Compliance

Ranking and serving: East Gibson School Corporation demonstrated compliance with the statutory requirements for ranking and serving.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with Comparability Requirement

Background

IDOE interviewed the Title I Program Supervisor and Chief Academic Officer regarding the Title I comparability requirement. The Comparability Report for 2006-2007 was due on November 15, 2006.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Areas of Compliance

None.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Other Matters:

Comparability: East Gibson School Corporation could not provide evidence that the comparability report was completed for the 2007-2008 school year. The IDOE gave technical assistance to East Gibson School Corporation on their comparability report. The IDOE recommends East Gibson School Corporation read the comparability guidance provided on the Office of Title I Academic Support website at: http://www.doe.state.in.us/title/comparability_info.html. East Gibson School Corporation must ensure comparability reports are completed yearly and submitted biannually to the IDOE. Failure to achieve comparability results in Title I funds already expended in the non-comparable building(s) being subject to repayment, and all unspent Title I funds being withheld for the remainder of the fiscal year.

Monitoring Topic 9: Compliance with Maintenance of Effort

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Areas of Compliance

East Gibson School Corporation is in compliance with the maintenance of effort requirement.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None.

Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements

Statutory Requirements: The equitable services requirements are contained in Section 1120.

East Gibson School Corporation does not serve any nonpublic schools with Title I funds.

Monitoring Topic 11: Compliance with Statutory Set-aside

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

East Gibson School Corporation does not have any mandatory set-asides.

Monitoring Topic 12: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Supervisor and corporation treasurer regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Area of Compliance

LEA guidance: East Gibson School Corporation provided emails to school administrators regarding Title I services supplementing the general education program.

Monitoring Topic 13: Compliance with Financial Management Systems Requirements

Background

IDOE interviewed the Title I Program Director and corporation treasurer regarding East Gibson School Corporation's financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Audit Findings: East Gibson School Corporation did not have any audit findings from Indiana State Board of Accounts regarding Title I.

Expenditure Monitoring Systems: East Gibson School Corporation filed quarterly and final expenditure reports on time.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Financial Management and Procurement: East Gibson School Corporation does not have a written policy for the procurement of items.

Required Action: East Gibson School Corporation must ensure that the process of an expense going from the budget page to ordering and procurement is followed for all expenditures. A written policy must be submitted to IDOE one month after the start of the 2008-2009 school year.

Expenditures are Reasonable, Allocable, and Necessary: East Gibson School Corporation was not able to provide evidence that expenditures meet the requirements of NCLB. The Title I Program Administrator shops for the best value before making a purchase order. However, in a random sampling of purchases, one bike was purchased.

Required Action: East Gibson School Corporation must ensure that all Title I expenditures meet the reasonable, allocable, and necessary requirements to effectively implement the Title I program.

In addition, East Gibson School Corporation must charge back a total of \$52.71 for a bike that was purchased for a door prize as a family involvement night. Documentation of the chargeback must be submitted to the IDOE.

Monitoring Topic 14 Compliance with compensation for personnel services requirements

Background

IDOE interviewed the Title I Program Director, corporation treasure as well as a school principal in regards to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance:

Compensation for personnel services requirements: East Gibson School Corporation was able to demonstrate sufficient compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

None.

Monitoring Topic 15: Compliance with complaint procedures

Background

IDOE interviewed the Title I Program Director and the corporation treasurer regarding the complaint process.

Areas of Compliance

Complaint Procedure Policy: East Gibson School Corporation has a complaint procedure policy; no complaints have been filed.

Recommendation: The complaint policy needs to be updated and included in school handbooks.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None.

Monitoring Topic 16: Compliance with equipment requirements – OMB A-87 and EDGAR 80.36

Background

IDOE interviewed the Title I Program Director, corporation treasurer and a school principal regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Title I Equipment: East Gibson School Corporation showed evidence that Title I equipment and technology was properly tagged.

Equipment and Technology Inventory: East Gibson School Corporation has an inventory list that meets the requirements of EDGAR 80.32.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16

Disposition of Equipment: East Gibson School Corporation could not provide evidence of a Disposition Policy.

Required Action: A Disposition of Equipment Policy must be submitted to the IDOE 30 days after the start of the 08-09 school year.

Monitoring Topic 17: Compliance with Neglected Institutions: Funded through Title I, Part A

Background

Definition of facility: A public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardian.

East Gibson School Corporation does not serve any Neglected Institutions with Title I funds.

Attachment A		Found on Page #
Requirements of School Parental Involvement Policy- Francisco and Oakland City- identical		
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved		Missing
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement		Missing
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy		Missing
4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible 		Missing Add more Missing
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA		N/A
6. Includes a School-Parent Compact (see checklist next page)		
1. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request 		Add more Add more Missing Missing Missing Missing

School – Parent Compact Checklist

DIRECTIONS:

Review the School Parental Involvement Policy prior to mailing to the IDOE to ensure that all requirements listed below are met:

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include: East Gibson	Found on Page #
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	Yes
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"> <input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement <input type="checkbox"/> Frequent reports to parents on their children's progress <input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities 	Missing